

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

PURDUE PHARMA L.P., *et al.*,¹

Debtors.

Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

Hearing Date: August 9, 2021, at 10:00
a.m., Eastern Standard Time

**CERTAIN DISTRIBUTORS, MANUFACTURERS,
AND PHARMACIES MOTION FOR LEAVE TO EXCEED PAGE
LIMIT IN FILING THE JOINT OBJECTION TO THE SIXTH AMENDED JOINT
CHAPTER 11 PLAN OF PURDUE PHARMA L.P. AND ITS AFFILIATED DEBTORS**

The Distributors, Manufacturers, and Pharmacies listed in **Exhibit A** (collectively, the “**DMPs**”) to the *Joint Objection of Certain Distributors, Manufacturers, and Creditors to the Sixth Amended Joint Chapter 11 Plan of Purdue Pharma L.P. and Its Affiliated* (the “**Joint Objection**”), by and through their respective undersigned counsel respectfully represent as follows in support of this motion (the “**Motion**”) for leave to exceed this Bankruptcy Court’s page limitations when filing the Joint Objection:

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnic Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717), and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

1. The *Second Amended Order Establishing Certain Notice, Case Management, and Administrative Procedures* [D.I. 498] (the “Case Management Order”), provides that “motions, applications and objections are limited to 40 pages[.]”

2. Paragraph 3(f)(i) of the *Second Amended Order Granting Debtors’ Motion for Order Establishing Confirmation Schedule and Protocols* [D.I. 2989] (the “Confirmation Protocols Order”) “encourage[s]” all parties objecting to the confirmation of the Debtors’ *Sixth Amended Joint Chapter 11 Plan of Reorganization of Purdue Pharma L.P. and its Affiliated Debtors* [D.I. 3185] (the “Plan”) “to coordinate and consolidate objections to the extent the objections are overlapping and the Parties represent similar constituencies.”

3. In keeping with the spirit of paragraph 3(f)(i) of the Confirmation Protocols Order, and to avoid this Bankruptcy Court reviewing numerous, largely duplicative objections, the DMPs have coordinated in the production of a single consolidated joint objection to the confirmation of the Plan, instead of possibly filing one or more individual objections.

4. To effectively address these concerns in the most economical and concise fashion, however, the DMPs required more than the forty pages permitted for each objection by the Case Management Order. Specifically, the length of the Joint Objection is fifty-five (55) pages, exclusive of the title page, table of contents, table of authorities, signature pages, and one exhibit. In drafting the Joint Objection, the DMPs have endeavored to be as concise as possible while still comprehensively explaining the bases for the opposition to the Plan’s confirmation by a mix of “similar,” but distinct, constituencies.

5. The DMPs submit that, although the Joint Objection exceeds this Bankruptcy Court’s page limitations, the consolidated briefing prevents this Bankruptcy Court, the Debtor, and

parties in interest from receiving and reviewing numerous separate objections, likely aggregating hundreds of pages, and including “overlapping” objections.

6. The DMPs have also obtained the consent of the Debtors for the relief sought herein.

7. For the above reasons, the DMPs respectfully request that this Bankruptcy Court grant the DMPs leave to file the Joint Objection, filed simultaneously with this Motion.

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Dated: July 22, 2021

Respectfully submitted,

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